

Todd Thompson, PE
Water Use Efficiency
Department of Water Resources
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VIA E-Mail

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WATER

Subject:

Comment Letter – Water Loss Audits and Water Loss Control Reporting
Second Revised Draft of Proposed Regulations in Response to Section 10608.34
- California Water Code

Date:

July 3, 2017

Contact:

Gary Trachtman

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Our ref:

3TKIWRCO.2014

Dear Mr. Thompson:

Arcadis appreciates the opportunity to comment further on the revised language of rulemaking, dated June 16, 2017, proposed by DWR in response to Section 10608.34 of the California Water Code to establish rules for the annual conduct and submittal of validated water loss audits to DWR as required by Senate Bill 555 (2015).

Arcadis has reviewed the latest proposed revisions to the rulemaking and, in general, continues to strongly support the Water Audit Methodology, Recommended Software, the Recommended Basis for Water Loss Control Actions and the Technical Assistance Program for training California drinking water system personnel in the preparation and validation (by individuals with appropriate validator qualifications). Arcadis also supports limiting the applicability of the proposed rulemaking to potable water systems, as being consistent with the intent of AWWA M36.

Arcadis also recognizes and appreciates DWR's retention of the previously proposed language in Section 700.4, which would broaden the eligibility of prospective Water Audit Validators to include those who do not exclusively perform water loss audits as part of their business practices, and which revisions would also reduce the minimum number of qualifying Level 1 validations performed (in accordance with AWWA M36, the Free Water Audit Software v5.0, and the protocol described in WRF Research Project 4639) from 30 to 10. That

said, Arcadis continues to believe that a more reasonable, yet still meaningful and appropriate threshold for individuals meeting these conditions for Technical Qualifications for a Water Audit Validator would be to have performed at least 5 such qualifying validations and should be so modified prior to adoption by DWR. As an example, it is common for entities issuing Requests for Proposals for professional services associated with projects involving a wide range of complexity to require Proposers to submit details of relevant experience for 3 to 5 representative projects. Accordingly, Arcadis continues to recommend that the proposed revised language of Section 700.4 (a)(2) be further modified as shown below:

§ 700.4. Technical Qualifications for a Water Audit Validator.

(a) For purposes of Reports submitted on or before June 30, 2019, a Water Audit Validator means:

(2) a person who can demonstrate having conducted water loss audits in accordance with the AWWA's Water Audits and Loss Control Programs, Manual M36 (4th Edition), American Water Works Association, 2016, and the AWWA Free Water Audit Software, version 5.0, and having conducted a minimum of ~~strike "10"~~ and ~~insert "5"~~ Level 1 audit validations in accordance with the Water Research Foundation Level 1 Water Audit Validation Guidance Manual 4639A (Water Audit Validation (Water Audit Validation), or

Arcadis believes that the recommended modifications to the proposed language of Section 700.4 (a)(2) will further DWR's objectives for the timely advancement of sound and defensible business practice for water loss auditing and control to be implemented by the large number of drinking water systems in California within the timeframe required in Senate Bill 555, while sufficiently expanding the pool of persons qualified to provide such assistance, if requested by drinking water systems.

Arcadis also concurs with the other revisions to 23 CCR Sections 700 through 700.6 and the underlying rationales proposed on June 16, 2017 by DWR.

I will be pleased to answer any questions you may have regarding the recommended modifications.

Sincerely,

Arcadis U.S., Inc.



Gary B. Trachtman, PE
Principal Environmental Engineer

Copies:

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